

REMARKS

In response to the final Office Action dated June 14, 2006, claim 19 has been amended. Therefore, claims 1-23 and 25-34 remain in the case. The Applicants respectfully request that this amendment be entered under 37 C.F.R. 1.116 to place the above-referenced application in condition for allowance or, alternatively, in better condition for appeal. In light of the amendments and arguments set forth herein, reexamination and reconsideration of the application are requested.

Claim Objections

The Office Action objected to claim 19 because of the claim language. The Examiner suggested the way in which the claim language should be changed to comply with the recent guidelines.

In response, the Applicants have amended claim 19 as suggested by the Examiner. The Applicants respectfully submit that the objection to claim 19 has been overcome by these amendments.

35 U.S.C. § 112, second paragraph Rejections

The Office Action rejected claims 18 and 31 under 35 U.S.C § 112, second paragraph, as failing to particularly point out and distinctly claim the subject matter that the Applicants regard as the invention. In particular, the Office Action stated that it "is unclear as to what applicant means in regards to current camera view is a 'weighted random' choice, as now claimed. It is not clear how they are related."

In response, the Applicants respectfully traverse these rejections. However, in an effort to further and expedite the prosecution of this application, the Applicants offer the following remarks.

The Applicants' claimed invention includes a virtual director that uses both "probabilistic rules and the expert production rules to determine the current camera view" (specification, paragraph [0016], lines 7-8). The claimed invention uses a "probabilistic

transition matrix constricted by expert video production rules to select the current camera view. Thus, the camera selected as the next current camera view is a weighted random choice" (specification, paragraph [0016], lines 12-14).

The "weighted random choice (or selection)" algorithm is well known in the computer science field. In this case, by "weighted random choice", it is meant that the probabilistic transition matrix randomly is used to randomly selected the next current camera view, but is constricted or restrained to the expert video production rules (specification, paragraph [0016], lines 12-14).. Certain expert video production rules have more weight than others. For example, "[I]f certain rules conflict they either can be excluded or the rules having the most weight can be included. By way of example, a rule may be considered to have more weight if the rule was from a video professional who has a great deal of experience or if the rule was obtained from a classic textbook on video production" (specification, paragraph [0088], lines 6-9).

Based on the arguments above, therefore, the Applicants request the withdrawal of the rejection of claims 18 and 31 under 35 U.S.C § 112, second paragraph, as failing to particularly point out and distinctly claim the subject matter that the Applicants regard as the invention.

Section 103(a) Rejections

The Office Action rejected claims 1-23 and 25-34 under 35 U.S.C. § 103(a) as being unpatentable over a paper by Bianchi entitled "AutoAuditorium: a Fully Automatic, Multi-Camera System to Televisе Auditorium Presentation" in view of a paper by Liu et al. entitled "Automating Camera Management for Lecture Room Environments".

Regarding independent claims 1, 18, and 31, the Office Action contended that Bianchi teaches each of the elements of the Applicants' claimed invention, but "is silent in regards to explicitly mention a set of expert video production rules that applied to select camera view." However, the Office Action stated that Liu et al. teach this feature.

In regard to claims 18 and 31, the Office Action also stated that Bianchi fails to teach the additional limitation that a "current camera view is a random choice". However, the Office Action stated that Liu et al. also teach this feature.

In response, the Applicants respectfully traverse these rejections. It is the Applicants' position that Liu et al. is not a reference under any section of 35 U.S.C. 102, and therefore cannot be used in combination with Bianchi to preclude patentability of the Applicants' claimed invention.

The Liu et al. paper is a Microsoft Research Technical Report dated September 21, 2000. The authors are Qiong Liu, Yong Rui, Anoop Gupta, and JJ Cadiz. The subject application, which was filed on June 14, 2001, has as inventors Qiong Liu, Yong Rui, and Anoop Gupta.

The Liu et al. paper cannot be a reference under 35 U.S.C. 102(a), since nothing that the Applicants, who have invented in the United States, can do will preclude them from obtaining a patent under this subsection. In order for 102(a) to be used against the Applicants, any barring act must occur "before the invention thereof by the applicant". In this case, the subject patent application was based on the Liu et al. technical paper, having the same authors (save one who was not responsible for the subject matter as claimed), and thus the Liu et al. paper cannot be a reference under 102(a).

The Liu et al. paper also cannot be a reference under 35 U.S.C. 102(b), since no barring event occurred more than one year prior to the patent application filing date. Subsections 102(c), (d), (e), (f), and (g) do not apply. Thus, Liu et al. is not a reference under any section of 35 U.S.C. 102, and therefore cannot be used in combination with Bianchi to preclude patentability of the Applicants' claimed invention.

Accordingly, the Applicants respectfully submit that independent claims 1, 18, and 31 are patentable under 35 U.S.C. § 103(a) over Bianchi in view of Liu et al. based on the legal arguments set forth above. Moreover, claims 2-17 depend from

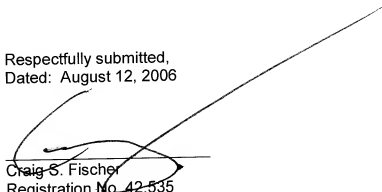
independent claim 1, claims 19-23 and 25-30 depend from independent claim 18, and claims 32-34 depend from independent claim 31, and are also nonobvious over Bianchi in view of Liu et al. (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 1-23 and 25-34.

Conclusion

In view of the arguments set forth above, the Applicants submit that claims 1-23 and 25-34 are in condition for immediate allowance. The Examiner, therefore, is respectfully requested to withdraw the outstanding rejections of the claims and to pass all of the claims of this application to issue.

In an effort to expedite and further the prosecution of the subject application, the Applicants kindly invite the Examiner to telephone the Applicants' attorney at (805) 278-8855 if the Examiner has any comments, questions or concerns, wishes to discuss any aspect of the prosecution of this application, or desires any degree of clarification of this response.

Respectfully submitted,
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Craig S. Fischer
Registration No. 42,535
Attorney for Applicants

LYON & HARR, L.L.P.
300 East Esplanade Drive, Suite 800
Oxnard, CA 93030-1274
Tel: (805) 278-8855
Fax: (805) 278-8064